

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

Broadwater Energy LLC	)	Docket No. CP06-54-000
	)	
Broadwater Pipeline LLC	)	Docket No. CP06-55-000
	)	Docket No. CP06-56-000

**MOTION TO INTERVENE OF  
BP ENERGY COMPANY**

Pursuant to Rule 212 and Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"),<sup>1</sup> BP Energy Company ("BP Energy") respectfully moves for leave to intervene in the above-captioned proceedings. In support hereof, BP Energy states as follows:

**I. STATEMENT OF ISSUES**

- On January 30, 2006, Broadwater Energy LLC ("Broadwater Energy") filed an application in Docket No. CP06-54-000, pursuant to Section 3 of the National Gas Act ("NGA"), for authorization to site, construct, and operate an offshore LNG receiving terminal and associated facilities in Long Island Sound.<sup>2</sup>
- On January 30, 2006, Broadwater Pipeline LLC ("Broadwater Pipeline") filed an application in Docket Nos. CP06-55-000 and CP06-56-000, pursuant to Section 7(c) of the NGA, for authorization to construct, own, operate, and maintain a

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<sup>1</sup> 18 C.F.R. §§ 385.212 and 385.214 (2005).

<sup>2</sup> Broadwater Energy LLC, Application for Authority to Construct and Operate Offshore LNG Facilities, FERC Docket No. CP06-54-000 (Jan. 30, 2006)

subsea lateral pipeline to transport natural gas from the offshore LNG facilities to an existing interstate pipeline.<sup>3</sup>

- Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Commission, BP Energy moves for leave to intervene in Docket Nos. CP06-54-000, CP06-55-000, and CP06-56-000.

## II. COMMUNICATIONS

BP Energy requests that the Commission include the following BP Energy representatives on the official service list:<sup>4</sup>

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## III. MOTION TO INTERVENE

On January 30, 2006, Broadwater Energy filed an application under Section 3 of the NGA and Part 153 seeking authorization to site, construct, and operate an offshore LNG receiving terminal and associated facilities ("Floating Storage and Regasification Unit" or

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<sup>3</sup> Broadwater Pipeline LLC, Application for Authority to Construct and Operate a Subsea Lateral Pipeline, FERC Docket Nos. CP06-55-000 and CP06-56-000 (Jan. 30, 2006).

<sup>4</sup> BP Energy requests that the Commission waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to allow BP Energy to include three representatives on the official service list.

"FSRU") in Long Island Sound, approximately nine miles from the shore of Long Island in New York State waters, as a place of entry for the importation of LNG. Broadwater Energy will facilitate the importation of LNG from foreign nations into the United States.

Broadwater Pipeline concurrently filed an application requesting: (a) a certificate of public convenience and necessity, pursuant to Subpart A of Part 157 of the Commission's regulations, authorizing Broadwater Pipeline to construct, own, operate, and maintain a 30-inch, 22-mile subsea lateral (and related facilities) as a single-use pipeline; and (b) a Part 157, Subpart F blanket construction certificate. Broadwater Pipeline seeks authorization to permit its proposed pipeline to be operated as a single use pipeline. That is, the pipeline will only be used for one purpose — to transport natural gas approximately 22 miles from the FSRU to a subsea interconnection with an existing interstate pipeline.

BP Energy is engaged in the marketing of natural gas and electricity and the importation of LNG into the United States. Once the imported LNG is re-gasified at LNG import terminalling facilities, BP Energy markets that re-gasified LNG like other natural gas. Accordingly, the Commission's actions in these proceedings, which relate to an LNG import terminal and pipeline facilities connected to that terminal, may directly and immediately affect BP Energy, and no other party can adequately represent BP Energy's interest. The Commission, therefore, should allow BP Energy to intervene in these proceedings.

#### IV. CONCLUSION

As discussed herein, BP Energy respectfully requests leave to intervene in these proceedings.

Respectfully submitted,

**BP ENERGY COMPANY**

By Peter I. Trombley

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*Attorneys for BP Energy Company*

March 6, 2006

**CERTIFICATE OF SERVICE**

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day served the foregoing document on each person designated on the official service list compiled by the Secretary in these proceedings.

Dated at Houston, Texas this 6th day of March, 2006.

Peter I. Trombley \_\_\_\_\_

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